RM-10867 by the ARRL is in my thinking, giving away the beginners license. It is a short step from this proposal to simply giving amateur radio privileges to anyone who applies without any demonstration of qualifications.

I believe a beginners license should look something like this:

- 1. The test should require the newcomer to learn basic radio and communication theory, modes, safety issues and especially RF safety.
- 2. There should be a time limit after which this license could not be renewed and very limited privileges. It should be a true beginners license and not a permanent stopping place.
- 3. Specifically as to HF spectrum,  $50\,\mathrm{kHz}$  on the top end of  $75\,\mathrm{m}$ ,  $40\,\mathrm{m}$ ,  $15\,\mathrm{m}$ , and  $28.300-28,500\,\mathrm{MHz}$  is more than enough for a beginners license.
- 4. 100 watts maximum power on all frequencies, including VHF/UHF

As for the General and Extra Class and the elimination of the Technician classes:

- 1. Keep the current General class examination as is, including the  $5\mbox{wpm}$  CW.
- 2. The current Technician class operator needs to specifically study important areas of HF operation, RF safety, data modes, band privileges, and other important HF operating topics that have not been tested for in years.

The Technician class applicant should study the requirements for HF and apply for a beginners license or upgrade by testing to General. 3. Keeping Extra class much like it is with a 5 wpm code test seems adequate.

In summary, the important feature the FCC should attempt to incorporate into any new structure, is an incentive plan for all license classes to encourage advancement to higher levels. Making a new class license that allows the newcomer to stagnate at the 'beginners' level will do nothing to improve the Amateur Radio Service. As for the ITU and their standards, they are nice, but are not binding on what we do. We need to set the standard, not sink to the lack of standards other countries may adopt.

I personally feel RM-10868 (by the RAF) is a better approach and have also commented on it separately. If the FCC could take the best parts of both, including these comments, especially about the time limit, and make a decision that will help Amateur Radio to grow strong with educated, law abiding people. To do this we need a incentive license plan , that insists on growth.

Sincerely,

Steve Kearny KW7N

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